

II. REPORT

A. Initial Disclosures

Plaintiff and Defendants have agreed to provide Rule 26(a) initial disclosures by May 11, 2015.

B. Deadlines

The parties request the following deadlines:

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| 1. Amendment of Pleadings | August 15, 2015 |
| 2. Discovery (including discovery motions) | February 8, 2016 |
| 3. Plaintiff's Expert Disclosures | October 1, 2015 |
| 4. Defendants' Expert Disclosures | November 1, 2015 |
| 5. Deadline for Filing Dispositive Motions and Motions to Strike Experts | March 14, 2016 |
| 6. Mediation | April 1, 2016 |

C. Possible Joinder of Additional Parties

The parties do not anticipate the joinder of any additional parties.

D. Discovery Issues

Plaintiff and Defendants anticipate that they may need to request that the Court enter a protective order and/or an order requiring production of documents relating to Christopher Francis and/or Jane Doe. Counsel for Plaintiff and Defendants discussed the documents that they believe are necessary, proper and relevant to this litigation and were in general agreement. Many of the documents are held by non-party governmental entities and Counsel are endeavoring to determine whether the documents are available without a Court order.

E. Estimated Trial Date and Length

Plaintiff and Defendants estimate that trial would last 5-7 days and that the case should

be ready for trial by June, 2016. A jury trial has been demanded.

F. Magistrate

Plaintiff and Defendants do not consent to referral of the case to a magistrate judge for trial.

G. Alternative Dispute Resolution

Counsel for Plaintiff and Defendants discussed the possibility of settlement and believe that mediation may be helpful after sufficient discovery is conducted. Plaintiff and Defendants have agreed upon a mediator: Mary Burdin of Burdin Mediations. Plaintiff and Defendants anticipate conducting mediation by April 1, 2016.

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANTS
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CERTIFICATE OF SERVICE

This is to certify that on the 8th day of April, 2015, I electronically filed the foregoing document with the clerk of the Court for the United States District Court, Northern District of Texas, using the electronic case filing system of the Court, and that it reported that it was delivered to all attorneys of record.

/s/ Joshua A. Skinner
JOSHUA A. SKINNER